

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRAPHIC ARTS MUTUAL INSURANCE COMPANY	:	CIVIL ACTION
	:	
vs.	:	
	:	
LOWER MERION SCHOOL DISTRICT, THE BOARD	:	NO.: 2:10-cv-01707-JD
OF DIRECTORS OF LOWER MERION SCHOOL	:	
DISTRICT, CHRISTOPHER W. MCGINLEY,	:	
Superintendent of Lower Merion School District, and	:	
BLAKE J. ROBBINS, a minor, by his Parents and	:	
Natural Guardians, MICHAEL E. ROBBINS and	:	
HOLLY S. ROBBINS	:	

REQUEST TO ENTER DEFAULT PURSUANT TO FED. R. CIV. P. 55(a)

Pursuant to Fed. R. Civ. P. 55(a), kindly enter default against Defendant, Blake J. Robbins, a minor, and his parents and natural guardians, Michael E. Robbins and Holly S. Robbins, for failure to plead or otherwise defend the Complaint as appears from the attached affidavit of R. Bruce Morrison, Esquire attached hereto.

Respectfully submitted,

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**

BY: _____

R. BRUCE MORRISON, ESQUIRE
Attorney for Plaintiff,
Graphic Arts Mutual Insurance Company
Atty. ID. No. 34797
1845 Walnut Street, 18th Floor
Philadelphia, PA 19103
(215) 575-2624
rbmorrison@mdwceg.com

Dated: _____

June 18, 2010

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRAPHIC ARTS MUTUAL INSURANCE COMPANY	:	
	:	
vs.	:	CIVIL ACTION
	:	
	:	
LOWER MERION SCHOOL DISTRICT, THE BOARD OF DIRECTORS OF LOWER MERION SCHOOL DISTRICT, CHRISTOPHER W. MCGINLEY, Superintendent of Lower Merion School District, and BLAKE J. ROBBINS, a minor, by his Parents and Natural Guardians, MICHAEL E. ROBBINS and HOLLY S. ROBBINS	: : : : : : : : : : :	NO.: 2:10-cv-01707-JD

AFFIDAVIT FOR ENTRY OF DEFAULT BY CLERK

I, R. Bruce Morrison, Esquire, being of sound mind and an adult individual and being duly sworn, deposes and says that:

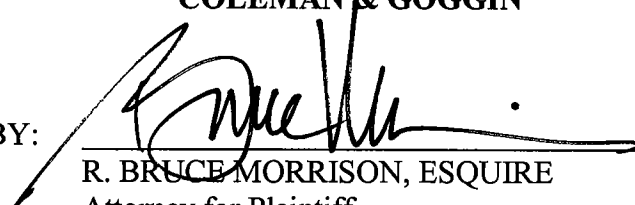
1. I am an attorney for Plaintiff in the above-captioned action.
2. Plaintiff's Complaint was filed with the Court on April 16, 2010.
3. On April 23, 2010, Plaintiff served the Complaint and summons on Defendant, Blake J. Robbins, a minor, and his parents and natural guardians, Michael E. Robbins and Holly S. Robbins, by personally serving an adult individual who was on the premises at that time, that being Lillian Myerson. A true copy of the affidavit of service has been filed with the Court.
4. To date Defendant, Blake J. Robbins, a minor, and his parents and natural guardians, Michael E. Robbins and Holly S. Robbins, have not filed any responsive pleading to Plaintiff's Complaint.
5. The Complaint in this case seeks a declaration from the Court that the Commercial General Liability Insurance Policy issued by Graphic Arts to the Lower Merion

School District does not provide insurance coverage for the claims specified in the Declaratory Judgment Complaint and thus no computation of damages needs to be performed.

Respectfully submitted,

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**

BY:



R. BRUCE MORRISON, ESQUIRE
Attorney for Plaintiff,
Graphic Arts Mutual Insurance Company

Dated: June 18, 2010

CERTIFICATE OF SERVICE

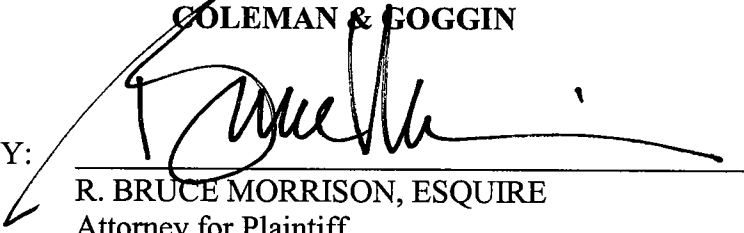
I, R. Bruce Morrison, Esquire, attorney for Plaintiff, do hereby certify that service of a true and correct copy of the Request to Enter Default Judgment is being served by United States Mail, first class and certified mail, on the date below to the following parties:

Mark S. Haltzman, Esquire
LAMM RUBENSTONE LLC
3600 Horizon Boulevard
Suite 200
Trevose, PA 19053
Attorney for Defendant
Blake J. Robbins
A minor, by his parents and
Natural guardians, Michael E.
Robbins and Holly S. Robbins

Douglas Y. Christian, Esquire
Joshua A. Mooney, Esquire
BALLARD SPAHR ANDREWS &
INGERSOLL, LLP
1735 Market Street
51st Floor
Philadelphia, PA 19103
Attorneys for Defendants
Lower Merion School District,
The Board of Directors of Lower Merion
School District and Christopher W.
McGinley, Superintendent of Lower Merion
School District

**MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN**

BY:



R. BRUCE MORRISON, ESQUIRE
Attorney for Plaintiff,
Graphic Arts Mutual Insurance Company

Dated: June 18, 2010

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